

**M-026 LDR Report Project Manager Meeting Minutes
Federal Building
Richland, Washington
February 26, 2015**

Meeting Minutes – Approval

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated meeting. Signatures denote concurrence with content only and do not imply agreement or commitments.



Mike Collins, Project Lead, DOE-RL

Date: 10 March 2015



Deborah Singleton, Project Manager, Washington State Department of Ecology

Date: 3/26/2015

Purpose: Discuss LDR Report related topics

The attached minutes are comprised of the following:

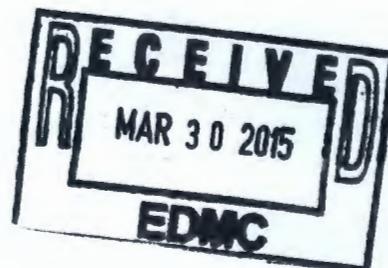
Attachment 1 - Meeting Minutes

Attachment 2 - Attendance List

Attachment 3 - Actions and Workshop Items

Attachment 4 – Preliminary Comments from Ecology on draft LDR Report

C: Admin Record, M-026



**M-026 LDR Report Project Manager Meeting Minutes
Federal Building
Richland, Washington
February 26, 2015**

Attachment 1

Meeting Minutes

1. CY2013 M-026-01X LDR Report Status

The approved and signed report is in the Administrative Record.

2. Storage Assessments/Data Gap Plans provided to TPA Lead Regulatory Agency Project Managers and updates of ongoing assessments.

- Status of assessment of IMUSTs not associated with a building

DOE-RL and Ecology discussed the IMUST assessments. The following is a summary of that discussion:

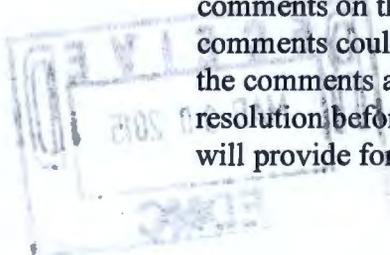
DOE indicated there is some question regarding which contractors are responsible for the selected IMUSTs; this issue is being resolved by DOE. It was agreed that DOE and Ecology need to define what "assessment" means and to determine what will be accomplished during an assessment (e.g., when physically performing an assessment and gaining access to an IMUST, perhaps tank can be remediated at same time). Elis Eberlein indicated most of the IMUSTs on the list were selected because they were associated with IS-1 and, schedule-wise, the assessments should be timed to support the IS-1 work scope.

- Ecology selection of proposed IMUST tanks for assessment

Elis Eberlein provided Ecology's list of IMUSTs for assessment via e-mail 1/22/2015; Action Item #1 closed.

3. CY2014 M-026-01Y LDR Report Status

- Nearly all contractor comments have been received on the draft report and the effort continues to gather the CERCLA ROD information requested by Ecology at the meeting held 2/18/2015.
- Ecology Comments - Elis Eberlein provided a hard copy of Ecology's comments on the draft CY2014 M-026-01 LDR report. Ecology agreed these comments could be provided as an Attachment to the minutes. Ecology noted the comments are preliminary, have not been consolidated; and do not require resolution before the LDR report is formally submitted 4/30/2015. Ecology will provide formal comments in mid-June following a 45 day review.



**M-026 LDR Report Project Manager Meeting Minutes
Federal Building
Richland, Washington
February 26, 2015**

4. Action Item Status

Actions from January PMM

<u>Action #</u>	<u>Responsible Party</u>	<u>Description</u>	<u>Status</u>
1	Ecology	Ecology select candidate IMUST tanks for assessment, if necessary.	Complete
2	MSA	Schedule a meeting with Ecology after the LDR report kick-off meeting.	Complete

Action 1: Complete.

Ecology provided list of IMUSTs for assessment on 1/22/2015.

Action 2: Complete.

A meeting was held 2/18/2015 between DOE, Ecology, and MSA during which DOE provided their proposed approach to meeting Ecology's request for waste stream treatment schedule information in the LDR Report. At that meeting, DOE proposed the LDR Report would include CERCLA RODs; Permit, Agreed Order, and Consent Agreement requirements; and WAC 171-303 requirements (i.e., one-year clock), along with TPA milestones, in the last column of Table 14-1. Ecology stipulated to this approach with caveat that: for every waste stream there should be an existing ROD or a TPA milestone; if not, then a treatment schedule should be provided. Ecology also suggested changing the title of the "Tri-Party Agreement Milestone" column to "Other Source Documents."

5. The 1/22/2015 meeting minutes were reviewed and signed by Elis Eberlein on behalf of Deborah Singleton, who had previously reviewed via email on 1/29/15 and, with correction on spelling of name, agreed minutes were ready for signature. Mike Collins had previously reviewed and signed on 2/18/2015.
6. Documents to be submitted to the Administrative Record
 - January 22, 2015 meeting minutes
7. Next meeting (date and time): March 26, 2015 at ~10:30 AM.

**M-026 LDR Report Project Manager Meeting Minutes
Federal Building
Richland, Washington
February 26, 2015**

Attachment 2

Attendance List

Name	Organization
Mike Collins	DOE
Elis Eberlein	Ecology
Kathy Davis	MSA
Dalena Weyns	MSA

**M-026 LDR Report Project Manager Meeting Minutes
Federal Building
Richland, Washington
February 26, 2015**

Attachment 3

Actions and Workshop Items

No Actions Assigned During February PMM

**M-026 LDR Report Project Manager Meeting Minutes
Federal Building
Richland, Washington
February 26, 2015**

Attachment 4

Preliminary Comments from Ecology on draft LDR Report (10 Pages)

Ecology Comments on draft copy of DOE/RL-2015-08. Comments created February 26, 2015.

Page / Section	Text	Comment
General		Since the LDR report is a TPA primary document, the document itself may contain the enforceable schedule. So if at TPA milestone does not exist the LDR report can specifically include the enforceable schedule.
1-4, TRUM-RH (EE)	It says "contact dose rate of >200mrem/ hr".	This assumes a human receptor is available to receive the dose. It should say ">200mR/hr" indicating the radiation is present and independent of human adsorbing the dose. It is correctly written on page 2-8 under MLLW-7.
1-6, T-Dragoff (EE)	"Waste was dipositioned and disposed".	As dispositioned and disposed is basically the same thing, do both need to be used in this sentence? Furthermore, my Webster considers disposition to be a noun only and not a verb.
1-6, 241-Z (EE)	"the 241-Z tank system has been closed".	Is this correct? The 241-Z-361 tank is not active but I am not sure it can be considered closed. It still has plenty of inventory and needs to be cleaned up under the ROD for PW-1/3/6, and it will create plenty of TRU or TRUM waste.
1-7, TX/TY (EE)	"Wesll"	Editorial: should be "Wells".
1-7, Section 1.2 (Comp)	A central database was used for managing data contained in Appendix B.	Name the database.
1-8, paragraph starting with "Changes..." (EE)	"either updating the document and publishing the updated report, documenting changes through use of errata sheets, or could be incorporated in the next annual LDR report".	This is not what Fig 9-1 in the TPA Action plan says about the process for primary documents. It should be acknowledged that this is the way it has been done a few times. Furthermore, what does it mean with "annual LDR report"? Is this the annual summary report or the full report?
1-10, paragraph starting with "In September.." (EE)	Editorial	There are some font size issues in the paragraph.
2-1, Section 2.3 Potential Mixed	Past-practice waste is waste that was abandoned before the first effective LDR	Example given, B Plant operated in support of WESF between 1990 and

Waste (Comp)	date in Washington State, August 19, 1987.	1995. B Plant activities between 1995 and 1998 were in support of a disposition process, which was known as the Transition Phase. The Possibility of Mixed Waste generated and stored in Dangerous Waste Management Unit vessels is likely during these time frames. Sampling and inventorying efforts were made during the transition phase and even earlier. These efforts were documented in HNF-3208 and the B Plant Preclosure Plan. The Potential Mixed Waste Table needs to be re-evaluated for deletion of line items (e.g. B Plant and PUREX tanks) and inserted in applicable sections and tables required in the LDR report.
2-2, top of page (EE)	"..waste that was abandoned before the first effective LDR date in WA state, August 19, 1987".	I think this is correct, but it is an indirect way of saying it. It wasn't LDR that was implemented on this date, it was the HWMA became effective in the state of Washington. LDR was just part of waste regulations.
2-4, Table 2-1 Storage Volumes of Mixed Waste Generation Projections and Table 2-2 Treatability Group Summary Storage, characterization, and treatment Activities (Comp)		The Treatability Group Name needs to first reference the specific TSDF Unit Group that the Treatability group Name is associated. From reading the table, a general reader would have to do research to find what TSDF Unit Group where the wastes are located and in some cases the Unit Group associated with the waste cannot be found (e.g. ERDF Treatment – what Unit Group is holding this waste?). Please add the specific TSDF Unit(s) in the column where the Treatability Group Name is listed. (e.g., T-Plant - 221-T Tank System) or add a written description in this section to point to Appendix B Table B-1 for this information.
3-1, section 3.2. (EE)	"No additional DOE-RL assessments are currently scheduled."	I don't know about "scheduled" but Ecology requested additional IMUST assessments just a few weeks ago to be added to list in table 3-2. This table says they are "In Progress"

		since 2006. Please fix the text and the table so that they say the same thing and is correct.
4-2, second last paragraph (EE)	On January 28, 2014.	This should be 2015.
8-2, Figure 8-1. Correlation Between Mixed Low-Level Wastes and Treatment Facilities. (Comp)		Under current treatment processes, if there is no treatment needed for ERDF treatment (MLLW-01 and LERF-ETF) should not be included. Under characterization needed - no treatment yet defined, B Plant covers canyon only. 221-T Tank System does not cover 2706 tank system.
8-3, fig 8-2 (EE)	324 Building REC Waste	The 324 building does not contain any TRU or TRUM waste. All is potential MLLW debris that is pretty hot because of Sr and Cs content. This waste should be added to Fig 8-1, under "Treatment Technology not yet defined".
9-2, Fig 9-2 (EE)	"In Trench Treatment"	This needs to be removed from the figure as it is not allowed under LDR regulations. It should be noted that EPA's CERCLA office is seeking a variance to continue using in trench treatment at ERDF for large equipment. That is a different issue though.
10-1, Fig 10-1 (EE)	WRAP and 221-T listed as existing capabilities	I think this is a misrepresentation of the situation. WRAP is not ready to process anything of the M-091 waste and is planned to be shut down. 221-T has potential to process large and RH containers, but does not possess that capability right now.
10-3, section 1-3 bullets (EE)	324 building REC waste	The 324 building does not contain any TRU or TRUM waste as commented on earlier on page 8-3. All planning for disposition of this facility assumes LLW and MLLW. This information needs to be moved to section 9.3.2.
10-4, section 10.3.3 (EE)	324 building REC waste	Move entire section to chapter 9.
11-2, table 11-1 (EE)	Date complete hot commissioning: 2018	Edit to align with reality.
12-1, Section 12		Since the Potential Mixed Waste has

Treatment of Potential Mixed Waste (Comp)		not been specifically identified it is difficult to comment on Section 12.
13-1, Section 13.0 (Comp)		There is no milestone to support delaying T Plant Complex Canyon characterization and treatment. The characterization and treatment schedule for the 221-T Tank System must be provided.
13-1, Section 13.0 (Comp)		2706-Tanks are not located in the Canyon, and must be characterized separately from the 221-T Tank System. The characterization and treatment schedule for the 2706-T Tanks must be provided.
13-2, Section 13.0 (Comp)		Using the M-016-00B or M-094 long-term schedules is inappropriate for all 325 HWTU wastes. Interim schedules for 325 HWTU wastes should be proposed in the LDR report.
13-2, Section, 13.0 (Comp)		M-085 covers only MW within the canyons of B Plant and PUREX. Any MW outside the canyon needs a schedule.
13-2, Section 13.0 (Comp)		M-091-42 covers the treatment of MLLW for small container CH MLLW in above ground storage as of June 30, 2009 and in retrievable storage. No other MW should be lumped under M-091-42.
14-2-, Section 14.0 (Comp)		Section 14, Some of the planned treatment periods are discrepant with associated milestones. Some of the planned treatment periods associated with milestones are not specified in referenced milestones.
14-3, Section 14.0 (Comp)		Using the date of "through 2035" for the planned treatment period for the LDR reporting for ERDF treatment is inappropriate. The ERDF treatment period is as listed in the appropriated CERCLA document. If no time period is specified in a CERCLA document, the treatment period must be within 12 months.
14-3, Section		The CERCLA document (ROD, work

14.0 (Comp)		plan, design document, etc.) that is quoted for the schedule must have a definitive schedule listed in it. The location of the schedule dates in the CERCLA documents must be referenced in the LDR report.
15-1, Section 15.0 (Comp)		Using Tri-Party Agreement Milestones for which the due date was exceeded does not provide for compliance with any LDR requirements. Listed in this section are the following exceeded milestones: M-015-112; M-016-175; M-036-01E; M-045-61; M-045-86H; M-045-91M-T01; M-045-91F-T04; M-045-91G-T04; M-062-01AD; M-091-40L-044; M-091-40U-T01; M-091-40V-T01; M-091-40W-T01; N-091-44Z-005; M-091-46B-T01; M-091-46C-T02; and M-091-46D-T03.
B-16, LERF/ETF (EE)	Contractor: CHPRC	WRPS will be contractor when this report comes out. Edit.
C-3- , Table C-2, Potential mixed waste table. (Comp)		Some of the Solid Waste on the Potential Mixed Waste Table (PMWT) has already been sampled and inventoried. This information could indicate the exclusion of the mixed waste from the PMWT and inclusion of the mixed waste in the remainder of the report. (B Plant and PUREX)
C-8 (EE)	DOE Assessments.	This mentions that the 242-Z facility with the McCluskey room is sealed. This is not correct, as work is ongoing to D&D this facility. Update information.
C-25, U Plant (EE)	Tank-10 in Cell 30	I thought this tank was known as the D-10 tank.
B-9, Appendix B, Group data sheet on 221-T Tank System Treatability Group Data Sheet, Section 4.4 (Comp)		This is not a treatment schedule. A schedule needs to be proposed to cover the T Plant Canyon.

B-13, Appendix B, Group data sheet on 221-T Tank System Location-Specific Data Sheet, Section 1.3.2 (Comp)	See the 2706-T location specific data sheet.	Where is the location-specific data sheet for 2706-T? These tanks should be separate from the 221-T Tank System, as they are not part of the same system.
B-19, Appendix B, Group data sheet on 222-S Laboratory Complex, Section 4.4 (Comp)	The goal of the 222-S Laboratory Complex is to treat waste off-site at commercial treatment facilities generally within one year. Waste that cannot be treated off-site will be shipped to CWC and will be subject to the schedules for treatment set forth in proposed TPA milestone M-091-42 (for contact-handled waste).	Language is too vague. If it is shipped off-site for treatment within one year, it is compliant. If the MW remains in storage longer than one year, it needs a schedule to be compliant. M-091-42 is only for CH MLLW that was in storage prior to 2009, or in retrieval trenches. Need to propose interim schedules for MW in storage over one year.
B-33, Appendix B, Group data sheet on 222-S T-8 Tunnel (Comp)		Needs a schedule.
B-41, Appendix B, Group data sheet on 241-CX Tank System (Comp)		Needs a schedule.
B-51, Appendix B, Group Data Sheet for 324 building, section 4.5 and 4.6 (EE)	Information not up to date.	M-089-06-T01, 30% design was submitted and accepted. M-089-06, permit mod is due June 30, 2016. Section 4.5 should mention these milestones.
B-61, Appendix B, Group data sheet on 325 HWTU (Comp)	Waste to be treated in the 325 HWTUs or at commercial treatment facilities will generally be treated and/or shipped as soon as practical but may be held over one year for various reasons. Waste shipped to CWC under an exemption will not be treated within one year; such waste will be subject to the schedules for treatment set forth in proposed TPA milestone M-091-42 (for contact-handled waste).	Language is too vague. If it is shipped off-site for treatment within one year, it is compliant. If the MW remains in storage longer than one year, it needs a schedule to be compliant. M-091-42 is only for CH MLLW that was in storage prior to 2009, or in retrieval trenches. Need to propose interim schedules for MW in storage over one year.
B-73, Appendix B, Group data sheet on 400 Area WMU		Need a schedule for continued storage. Section 2.7, "An assessment is not needed. The TSD unit is a new unit managed in compliance with

(Comp)		WAC 173-303." This is incorrect. A compliance report was issued in 2014 stating that the TSD is not in compliance. Need a storage compliance assessment.
B-81, Appendix B, Group data sheet on B Plant Cell 4 (Comp)	B-Plant is under long term surveillance and maintenance in accordance with Section 8.0 of the Tri-Party Agreement Action, Facility Decommissioning Process.	Section 4.9 incorrectly identified a key assumption. EPA rescinded approval of this S&M plan. A schedule needs to be developed for this MW. In addition a compliance storage assessment needs to be performed to assess all MW storage areas outside of the canyon.
B-91, Appendix B, Group data sheet on B Plant Containment Building (Comp)		Same comments as above.
B-107, Appendix B, Group data sheet on DST Waste – LDR Treatability Group Datasheet (Comp)	Section 2.2 lists the same generation every year	However SSTs are being retrieved to DSTs, so this should be reflected as waste is being retrieved from SSTs.
B-107 and B-439, Appendix B, Group data sheet on DST and SST LDR Report - Waste Location Specific Datasheet (Comp)		Shouldn't Section 2.8 reference TPA Milestone M-062-00 as referenced in the LDR Treatability Group Datasheet?
B-113, Appendix B, Group data sheet on 204-AR Catch Tank – LDR Treatability Group Datasheet (Comp)		Develop a schedule for treatment for 204-AR.
B-118, Appendix B, Group data sheet on 222-S Bulk Aqueous		Develop a schedule for treatment for 222-S. Since this is going to DST system, shouldn't this reference TPA Milestone M-062-00 as referenced in

Liquid – LDR Treatability Group Datasheet (Comp)		the LDR Treatability Group Datasheet?
B-129, Appendix B, Group data sheet on ERDF – Treatment, Section 4.4 (Comp)	ERDF acceptance of waste requiring treatment is coordinated so treatment and disposal can occur within a short time of receipt of the waste.	This is too vague. Either the CERCLA document must specify how long it can be in storage for ERDF treatment, or if no time period is specified in a CERCLA document, the treatment period must be within 12 months.
B-155, Appendix B, Group data sheet on HSTF (Comp)		Needs a schedule.
B-167, Appendix B, Group data sheet on LERF/ETF Liquid Waste – LDR Treatability Group Datasheet (Comp)	Section 4.4 states – continuous based on LERF Campaigns.	Right now you cannot differentiate between waste that will be treated within a year and waste that is being stored for waste over one-year. An interim schedule for waste storage needs to be included.
B-195, Appendix B, Group data sheet on LERF/ETF – Solid Wastes - LDR Treatability Group Datasheet – Section 5.0 (Comp)		There needs to be an explanation as what events would require treatment. If it is to be sent off-site, are you ensuring it will be treated within a year? If it will be held for over one-year, you will need a schedule to hold the waste for over one-year. You are currently missing an enforceable treatment schedule. Please include more details on the schedule for off-site treatment in the LDR Treatability Group Datasheet.
B-209, Appendix B, Group data sheet on MLLW-01-LDR Compliant Waste (Comp)		Why is this waste in this LDR report?
B-229, Appendix B, Group data sheet on MLLW-02 – Inorganic Non-Debris		This data sheet should state specifically that all newly generated waste <u>will be</u> treated and disposed within one year as treatment is already available. If not, need

(Comp)		interim schedule. Legacy waste should have interim schedules listed.
B-251, Appendix B, Group data sheet on MLLW-03 – Organic Non-Debris (Comp)		This data sheet should state specifically that all newly generated waste <u>will be</u> treated and disposed within one year as treatment is already available. If not, need interim schedule. Legacy waste should have interim schedules listed.
B-277, Appendix B, Group data sheet on MLLW-04 – Hazardous Debris (Comp)		This data sheet should state specifically that all newly generated waste <u>will be</u> treated and disposed within one year as treatment is already available. If not, need interim schedule. Legacy waste should have interim schedules listed.
B-343, Appendix B, Group data sheet on MLLW-07 – RH and Large Container (Comp)		This data sheet should state specifically that all newly generated waste <u>will be</u> treated and disposed within one year as treatment is already available. If not, need interim schedule. Legacy waste should have interim schedules listed.
B-373, Appendix B, Group data sheet on MLLW-08 – Unique Waste, see Page B-382 (Comp)		Is this TRUM?
B-423, Appendix B, Group data sheet on PUREX Plant (Comp)	Decommissioning of the PUREX Plant is addressed under Chapter 8 of the Tri-Party Agreement Action. The PUREX Plant is under long term surveillance and maintenance in accordance with Section 8.0, Facility Decommissioning Process, of the Tri-Party Agreement.	Section 4.9 incorrectly identified a key assumption. EPA rescinded approval of this S&M plan. A schedule needs to be developed for this MW. In addition a compliance storage assessment needs to be performed to assess all MW storage areas outside of the canyon.
B-431, Appendix B, Group data sheet on PUREX Storage Tunnels (Comp)		Same comments as above.
B-431, Appendix B, Group data sheet on Purex Tunnels. (EE)	Waste is expected to contain a combination of TRU and TRUM.	Why is not this reflected in section 3.1 of the sheet describing “radiological characteristics”?
B-451, Appendix	Waste is TRUM	Why is not this reflected in section

B, Group data sheet on TRUM-CH large container (EE)		3.1 of the sheet describing "radiological characteristics"?
B-475, Appendix B, Group data sheet on TRUM-CH small container (EE)	Waste is TRUM	Why is not this reflected in section 3.1 of the sheet describing "radiological characteristics"?
B-509, Appendix B, Group data sheet on TRUM-RH (EE)	Waste is TRUM	Why is not this reflected in section 3.1 of the sheet describing "radiological characteristics"?